

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: ) Bankr. No. 19-22653 JCM  
STEPHEN R. HANEY AND )  
AMY LOUISE HANEY, ) Chapter 13  
Debtors. )  
ROCKET MORTGAGE f/k/a ) Docket No. 69  
QUICKEN LOANS, ) Related to Docket No.  
Movant, )  
vs. ) Hearing Date & Time:  
STEPHEN R. HANEY AND )  
AMY LOUISE HANEY, )  
Respondents. ) Claim No. 4

**DECLARATION OF MORTGAGE PAYMENT CHANGE**

And Now, comes the Debtors, Stephen R. Haney and Amy L. Haney, by and through their attorney, who respectfully represents the following:

1. On or about June 30, 2019, Debtors filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Rocket Mortgage, filed a Notice of Mortgage Payment Change on October 25, 2023. The monthly mortgage payment of **\$1,43.42** is being **decreased to \$1,014.75** effective **12/1/2023**.

WHEREFORE, the Debtors request that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Date: 10/26/2023

Respectfully submitted.

/s/ Rodney D. Shepherd

Rodney D. Shepherd, Esquire

Attorney for the Debtors

PA I.D. No. 56914

2403 Sidney Street, Suite 208

Pittsburgh, PA 15203

(412) 471-9670

[rodsheph@cs.com](mailto:rodsheph@cs.com)

**CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the Debtors, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 26<sup>th</sup> day of October, 2023, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire  
Chapter 13 Trustee  
cmecl@chapter13trusteewdpa.com

Rocket Mortgage  
Attn: Denise Carlon, Esquire  
dcarlonkmlawgroup.com

By: /s/ Rodney D. Shepherd  
Rodney D. Shepherd  
Attorney for the Debtor  
PA I.D. No. 56914  
rodsheph@cs.com  
2403 Sidney Street  
Suite 208  
Pittsburgh, PA 15203  
412 471-9670